

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**THIS DOCUMENT RELATES TO:**

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P., et al.,*  
Case No. 18-op-45090

*The County of Cuyahoga, Ohio, et al. v.  
Purdue Pharma L.P., et al.,*  
Case No. 17-op-45004

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF DEAN A. VANELLI IN SUPPORT OF  
CVS'S MOTION FOR SUMMARY JUDGMENT**

I, Dean A. Vanelli, hereby affirm, under penalty of perjury, that I am over 18 years of age and am competent to make the following declaration:

1. I have personal knowledge of the matters stated herein, and they are true and correct to the best of my knowledge. I am authorized to make this declaration on behalf of Defendants CVS Indiana, L.L.C. and CVS Rx Services, Inc. (together with their parents, subsidiaries, and affiliates, "CVS"). I authorize the use of this declaration in connection with the above-captioned cases.

2. I have been employed with CVS since 1996. I am currently the Senior Director Outbound Transportation, a position I have held since March 2019. Prior to that, I was Senior Director Logistics Operations from approximately 2012 until March 2019.

3. As Senior Director Logistics Operations, I oversaw the distribution centers owned and/or operated by CVS. One of those distribution centers is CVS Rx Services, Inc., which is CVS's distribution center in Chemung County, New York.

4. My duties as Senior Director Logistics Operations included overseeing the operation of CVS's suspicious order monitoring system for orders placed with CVS's distribution centers by CVS pharmacies.

5. CVS began implementing a new suspicious order monitoring program in March 2014.

6. By April 14, 2014, orders for hydrocodone combination products placed by CVS pharmacies in Summit and Cuyahoga counties were fulfilled ("picked") at the CVS Rx Services, Inc. distribution center and then shipped to the servicing distribution center in Somerset, Pennsylvania, from which the orders were delivered to CVS pharmacies in Summit and Cuyahoga counties.

7. All orders serviced by CVS's Somerset distribution center were monitored by the new SOM system by April 14, 2014, including orders of controlled substances that were picked by CVS Rx Services, Inc. and then shipped to CVS's Somerset distribution center for delivery to CVS pharmacies.

8. As a result, all orders for hydrocodone combination products placed by CVS pharmacies in Summit and Cuyahoga counties after April 14, 2014 were monitored by the new SOM system.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27<sup>th</sup> of June, 2019, in Woonsocket, Rhode Island.

  
DEAN A. VANELLI